

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Eugene Westmoreland,)	
)	
Plaintiff,)	No.: 23-cv-1851
)	
v.)	
)	
Cook County Sheriff Thomas Dart, et al.)	Judge Tharp, Jr.
)	
Defendants.)	
)	

**DEFENDANTS' MOTION FOR EXCESS PAGES
FOR DEFENDANTS' RESPONSE IN OPPOSITION TO
PLAINTIFF'S MOTION FOR CLASS CERTIFICATION**

NOW COME Defendants COOK COUNTY SHERIFF THOMAS DART, and COOK COUNTY, a body politic and corporate, by and through their attorneys, Jason E. DeVore and Zachary G. Stillman, of DeVore Radunsky LLC, pursuant to Local Rule 7.1, and for Defendants' Motion for Excess Pages for their Response in Opposition to Plaintiff's Motion for Class Certification, state as follows:

1. Pursuant to Local Rule 7.1 of the Northern District of Illinois, "[n]either a brief in support of or in opposition to any motion ... shall exceed 15 pages without prior approval of the court."
2. Defendants' Response in Opposition to Plaintiff's Motion for Class Certification (ECF Nos. 7, 8.) is due on July 17, 2023. (ECF No. 19.)
3. In the course of drafting their Response, Defendants have found 15 pages to be too limited to fully discuss all elements involved and allow the court an opportunity to rigorously review plaintiff's claims and assertions as required under the law.
4. Defendants therefore request an extension of 5 pages, for a total permitted page count of 20, not including the mandated "table of contents with the pages noted and a table of cases." LR 7.1.

5. Allowing Defendants to have a 20-page brief will afford this court the opportunity to undertake a rigorous analysis of the issues and each individual element. It will also allow Defendants to provide this Court with a Table of Contents and Listing of Cases to better guide its analysis.
6. Not granting this motion would prejudice Defendants by foreclosing them the opportunity to fully address each of the required elements for class certification and vigorously contest Plaintiff's Motion and articulate their arguments.
7. Granting an extension of the page limit will not prejudice any party and this motion is not brought for any improper purpose.
8. Defendants have not had the opportunity to obtain an agreement with Plaintiff because the need for this motion was discovered on a Sunday night.

WHEREFORE, Defendants respectfully request that this Honorable Court enter an order as follows:

1. Defendants' Motion for Excess Pages is Granted;
2. Defendants' page limit for their Response in Opposition to Plaintiff's Motion for Class Certification shall be extended by 5 pages for a total of 20 pages, not including the table of contents and table of cases.

Respectfully Submitted,

Defendants

By: /s/ Jason E. DeVore
Jason E. DeVore, One of the Attorneys
for Defendants

DEVORE RADUNSKY LLC

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that Defendant's Motion for Excess Pages was filed on July 16, 2023, with the Northern District of Illinois ECF System, serving a copy to all parties.

/s/Zachary Stillman
Zachary Stillman